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On behalf of The American Civil Liberties
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON AT RICHLAND

JOHN DOE 1; JOHN DOE 2; JANE
DOE 1; JANE DOE 2; JANE DOE 3;
and all persons similarly situated,

Plaintiffs,

v.

WASHINGTON STATE
DEPARTMENT OF CORRECTIONS;
STEPHEN SINCLAIR, Secretary of The
Department of Corrections, in his official
capacity,

Defendants,

and

BONNEVILLE INTERNATIONAL,
INC., a Utah Corporation, d.b.a KIRO
Radio 97.3 FM,; THE MCCLATCHY
COMPANY, LLC, a California Limited
Liability Company, d.b.a. The Tacoma
News Tribune; and ANDREA KELLY,
an individual;

Interested Parties.

No.

PROPOSED
ORDER TO PROCEED IN
PSEUDONYM - UNOPPOSED

1 The Court having considered Plaintiffs' Unopposed Motion to Proceed
2 Under Pseudonym, the Memorandum of Points and Authorities supporting the
3 Motion, the Declarations submitted in support of the Plaintiffs' Motions for
4 Temporary Restraining Order and Preliminary Injunctive Relief, and having
5 considered the other documents filed with the Court to date, and being fully
6 advised in the matter, now
7

8 FINDS that Plaintiffs have demonstrated good cause to allow Plaintiffs to
9 proceed in pseudonym, and this outweighs any prejudice to the opposing party or
10 to the public's interest, therefore it is hereby ORDERED:
11

12 That Plaintiffs are allowed to proceed under pseudonym as follows:

- 13 1. Plaintiffs will be referred to by the pseudonym Jane Doe 1, 2, or 3 or
14 John Doe 1 or 2, in all pleadings, depositions, and other documents
15 related to this litigation;
- 16 2. Plaintiffs shall be allowed to endorse documents related to this litigation
17 using their pseudonym, as noted above; and
- 18 3. Defendants shall not publicly disclose the Plaintiffs' names or personally
19 identifying information.
20

21 In all proceedings held before this Court, including trial, all counsel,
22 witnesses and court personnel present shall refer to Plaintiffs according to their
23 pseudonym.

1 DATED this ____ day of April, 2021.

2
3
4 _____
5 JUDGE _____

6 RESPECTFULLY SUBMITTED this 7th day of April, 2021.

<p>8 MacDonald Hoague & Bayless</p> <p>9</p> <p>10 By: _____</p> <p>11 Joe Shaeffer, WSBA #33273</p> <p>12 joe@mhb.com</p> <p>13 Attorneys for Plaintiffs</p> <p>14 On behalf of The American Civil</p> <p>15 Liberties Union of Washington</p> <p>16 Foundation</p> <p>17 705 Second Avenue, Suite 1500</p> <p>18 Seattle, WA 98104</p> <p>19 Tel: 206.622.1604</p> <p>20 Fax: 206.343.3961</p>	<p>Munger, Tolles & Olson LLP</p> <p>By: _____</p> <p>Katherine M. Forster, CA Bar #217609</p> <p><i>Seeking Pro Hac Vice Admission</i></p> <p>Katherine.Forster@mto.com</p> <p>Attorneys for Plaintiffs</p> <p>350 South Grand Avenue, 50th Floor</p> <p>Los Angeles, CA 90071</p> <p>Tel: 213.683.9538</p> <p>Fax: 213.593.2838</p>
<p>American Civil Liberties Union of Washington Foundation</p> <p>By: _____</p> <p>Nancy Talner, WSBA #11196</p> <p>TALNER@aclu-wa.org</p> <p>By: _____</p> <p>Lisa Nowlin, WSBA #51512</p> <p>lnowlin@aclu-wa.org</p> <p>By: _____</p> <p>Antoinette M. Davis, WSBA #29821</p> <p>tdavis@aclu-wa.org</p>	<p>Disability Rights Washington</p> <p>By: _____</p> <p>Ethan D. Frenchman, WSBA #54255</p> <p>ethanf@dr-wa.org</p> <p>By: _____</p> <p>Danny Waxwing, WSBA #54225</p> <p>dannyw@dr-wa.org</p> <p>By: _____</p> <p>Heather McKimmie, WSBA #36730</p> <p>heatherm@dr-wa.org</p>

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By: _____
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CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2021, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the CM/ECF registrants for this matter.

RESPECTFULLY SUBMITTED this 7th day of April, 2021.

/s/

Name